

STATE OF MICHIGAN 67th JUDICIAL DISTRICT 7th JUDICIAL CIRCUIT		COMPLAINT FELONY		CASE NO. DISTRICT CIRCUIT	
District Court ORI: MI-		Circuit Court ORI: MI-			
THE PEOPLE OF THE STATE OF MICHIGAN v (1) STEPHEN BUSCH 01/15/1976 (2) MICHAEL PRYSBY 01/11/1963 (3) MICHAEL GLASGOW 10/20/1975 Codefendant(s)				Victim or complainant LEEANNE WALTERS Complaining witness JEFF SEIPENKO	
				Date: On or about January 2013 through Present	
City/Twp./Village Flint	County in Michigan Genesee	Defendant TCN	Defendant CTN	Defendant SID (3) 1774645M	Defendant DOB
Police agency report no. 16-0001	Charge Misconduct Office, Conspiracy, Tampering w/Evidence			Maximum penalty 5 years	
☐ A sample for chemical testing for DNA identification profiling is on file with the Michigan State Police from a previous case.		☐ Oper./Chauf. ☐ CDL	Vehicle Type	Defendant DLN	

STATE OF MICHIGAN, COUNTY OF GENESEE

The complaining witness says that on the date and at the location described, the defendant, contrary to law,

COUNT 1 DEFENDANTS (01) (02) – COMMON LAW OFFENSES – MISCONDUCT IN OFFICE

did between February 2015 and November 2015, commit misconduct in office, an indictable offense at common law, by willfully and knowingly misleading federal regulatory officials in the Environmental Protection Agency, including, but not limited to, Miguel Del Toral, and/or Genesee County Health Department officials, including, but not limited to, James Henry, in violation of his duty to provide clean and safe drinking water to the citizens of the County of Genesee, State of Michigan and to protect the public health; contrary to MCL 750.505. [750.505]

FELONY: 5 Years and/or \$10,000.00

COUNT 2 DEFENDANT (02) – COMMON LAW OFFENSES – MISCONDUCT IN OFFICE

did on or about April 4, 2014, commit misconduct in office, an indictable offense at common law, by authorizing a permit to the Flint Water Treatment Plant knowing the Flint Water Treatment Plant was deficient in its ability to provide clean and safe drinking water for the citizens of the County of Genesee, State of Michigan; contrary to MCL 750.505. [750.505]

FELONY: 5 Years and/or \$10,000.00

COUNT 3 DEFENDANTS (01) (02) – CONSPIRACY - TAMPERING WITH EVIDENCE

did between January 2015 and November 2015, unlawfully conspire, combine, confederate and agree together and with persons, both known and unknown to the People of the State of Michigan, to commit an offense prohibited by law, to wit: Tampering with Evidence, including but not limited to, manipulating monitoring reports mandated by law; contrary to MCL 750.157a. [750.483A6A][C]

FELONY: 4 Years and/or \$10,000.00

COUNT 4 DEFENDANTS (01) (02) – TAMPERING WITH EVIDENCE

did knowingly and intentionally remove, alter, conceal, destroy, or otherwise tamper with evidence, to wit: reports titled "Lead and Copper Report and Consumer Notice of Lead Result" dated February 27, 2015 and/or July 28, 2015 and/or August 20, 2015; contrary to MCL 750.483a(6)(a). [750.483A6A]

FELONY: 4 Years and/or \$5,000.00

COUNT 5 DEFENDANTS (01) (02) – TREATMENT VIOLATION - MICHIGAN SAFE DRINKING WATER ACT

did cease the utilization of optimal corrosion control treatment at the Flint Water Treatment Plant after the Plant switched to the Flint River as a water source and/or did refuse to mandate optimized corrosion control treatment at the Flint Water Treatment Plant in a timely manner after the lead action level was exceeded; contrary to MCL 325.1001. [325.1001]

MISDEMEANOR: 1 Year and/or \$5,000.00 for each day of violation

COUNT 6 DEFENDANTS (01) (02) – MONITORING VIOLATION - MICHIGAN SAFE DRINKING WATER ACT

did improperly manipulate the collection of water samples by directing residents to “pre-flush” their taps by running the water for five minutes the night before drawing a water sample and/or did fail to collect required samples included in the Tier 1 category of service lines and/or did remove test results from samples to be included in the Lead and Copper Report and Consumer Notice of Lead Result; contrary to MCL 325.1001. [325.1001]

MISDEMEANOR: 1 Year and/or \$5,000.00 for each day of violation

COUNT 7 DEFENDANT (03) – TAMPERING WITH EVIDENCE

did knowingly and intentionally remove, alter, conceal, destroy, or otherwise tamper with evidence to be offered in an official proceeding, to wit: the report titled “Lead and Copper Report and Consumer Notice of Lead Result” dated February 27, 2015 and/or July 28, 2015 and/or August 20, 2015; contrary to MCL 750.483a(6)(a). [750.483A6A]

FELONY: 4 Years and/or \$5,000.00

COUNT 8 DEFENDANT (03) – WILLFUL NEGLECT OF DUTY

did willfully neglect to perform a duty enjoined upon him by Michigan Safe Drinking Water Act, to wit: by failing to perform the duties of an F-1 Certified Operator employed by the Flint Water Treatment Plant; contrary to MCL 750.478. [750.478]

MISDEMEANOR: 1 Year and/or \$1,000.00

☐ The complaining witness asks that defendant be apprehended and dealt with according to law.

Warrant authorized on _____ by: Date
Prosecuting official
☐ Security for costs posted

Complaining witness signature

Subscribed and sworn to before me on _____
Date

Judge/Magistrate/Clerk Bar no.